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**** C O N F I D E N T I A L ****
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 2843
Case No. 18-md-02843-VC

-----x
IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION
-----x

This document relates to:
ALL ACTIONS

-----x
December 20, 2021
5:04 p.m.

Videotaped Deposition of TYLER KING,
taken by Defendant, pursuant to Notice,
held via Zoom videoconference, before Todd
DeSimone, a Registered Professional
Reporter and Notary Public of the States of
New York and New Jersey.

1 T. KING - CONFIDENTIAL

2 objections to this interrogatory?

3 MS. WEAVER: I object to that,
4 to the extent that calls for a legal
5 conclusion.

6 A. I see where it says "Plaintiff
7 objects."

8 Q. Okay. Let's turn to page 15.

9 A. Okay.

10 Q. Will you just review starting
11 with "Subject to and without these
12 objections" and then the rest of the
13 response. I would like you to just take a
14 minute or two to review that.

15 A. You are referring to the
16 paragraph where it starts "Subject to and
17 without waiving these objections"?

18 Q. Yes.

19 A. Okay.

20 (Witness perusing document.)

21 A. Okay.

22 Q. Does your answer to
23 Interrogatory No. 20 completely describe
24 the harm and damages you claim to have
25 suffered from Facebook's alleged wrongdoing

1 T. KING - CONFIDENTIAL

2 in this case?

3 MS. WEAVER: Objection, form.

4 A. It describes harms that
5 Facebook -- that I endured because of
6 Facebook's actions. I don't think I'll
7 ever know all of the ways that Facebook
8 harmed its users because Facebook has not
9 made information available to me from the
10 profile that it has kept on me, the
11 information and data that it kept on me and
12 that it disseminated to whitelisted third
13 parties, among others. I don't know. I
14 would like to see that transparency so that
15 I would have a fuller picture of what
16 information they took and what harm was
17 done.

18 Q. Does this response to this
19 interrogatory number completely list all of
20 the harm that you know that you have
21 suffered as a result of Facebook's alleged
22 wrongdoing in this case?

23 MS. WEAVER: Objection, form.

24 Q. I think you will have to repeat
25 your answer. I didn't quite catch it.